CONESTOGA-ROVERS & ASSOCIATES

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO:	Ms. Sharon Newlon	REF. NO.:	042192-03
FROM:	Garth Daley/ko/101	DATE:	June 29, 2007
C.C.:	RRG/Clayton Site Technical Committee P. Harvey R. Shepherd B. Schloessler		
RE:	**Status Report # 20 for the Resource Recovery Group/Clayton Chemical Company Site**		

This Status Report is being submitted to the United States Environmental Protection Agency (U.S. EPA) and its designated On-Scene Coordinator (OSC) Kevin Turner in accordance with Section VIII, Condition 19.a. of the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the Resource Recovery Group/Clayton Chemical Soils (RRG/Clayton) Site dated October 28, 2005. The reporting period for this twentieth Monthly Status Report is May 28, 2007, through June 22, 2007.

EFFECTIVE DATE

On November 1, 2005, Ms. Sharon Newlon, the acting counsel for the RRG/Clayton Site Potentially Responsible Party Group (The Respondents), received the AOC. In accordance with Section XXVIII, Condition 76 of the AOC, this date represented the Effective Date for the AOC and started the compliance time clock for the Removal Action. Status Report # 19 was submitted to U.S. EPA on June 1, 2007.

1.0 COMPLETED ACTIVITIES

1.1 PRE-MOBILIZATION, MOBILIZATION AND REMOVAL ACTIVITIES COMPLETED TO DATE

Activities completed during the reporting period were primarily related either to the completion of the proposed activities presented to U.S. EPA related to the subsurface liquids discovered at the northeast quadrant of the Site on March 16, 2007 and the investigation of the loading dock associated with the Waste Drum Storage Building (Drum Building). Field activities were performed over the span of 3 days, and are discussed in this report, along with the activities proceeding and subsequent to the field activities.

CRA conducted the above mentioned investigations simultaneously at the Site during the week of June 4–8, 2007, but alternated between the work/investigation areas. The investigation actions were observed by personnel from CRA, U.S. EPA, IEPA and START and performed by Brandenburg personnel. Activities were performed as defined in the U.S. EPA-approved work plans to the extent possible/practical.

Additional details of the completed tasks are provided for review in this report, as well as in select attachments to this report. No other field actions were completed during the reporting period.

A weekly summary of activities appears below:

- During the week of May 28, 2007 (May 28 – June 1, 2007), the primary activities that were completed centered on CRA's attempts to coordinate the subcontractor and personnel activities to facilitate the scheduled June 4, 2007, activities mobilization date. To facilitate a last minute problem with the scheduling of material disposal, The Respondents provided OSC Turner with the facility information required in Condition 21 of the AOC for two alternate disposal facilities that were being considered for use. The Respondents also completed and submitted the monthly Status Report. No Site visits were initiated during the week of May 28, 2007;
- The primary activities completed during the week of June 4, 2007 involved the site investigations activities at the subsurface structure located at the northeast portion of the Site, and the loading dock for the Drum Building. CRA and Brandenburg personnel and equipment were mobilized to the Site on Monday, June 4. Initial Site and area preparation were also made on that date in anticipation of the week's activities. The liquid removal and investigation actions were mostly completed on June 5, 2007, with the removal of approximately 1,500 gallons of liquids, the investigation of 5 discrete locations in the vicinity of the two openings discovered at the Site on March 16 and 23, 2007, and the removal of overburden soils to determine the lateral extent of the structure involved. Actual investigative activities related to the Drum Building loading dock were also started on June 4, 2007 with the coring of five investigation locations at the direction of OSC Turner. These locations were secured overnight pending OSC Turner's review of them on June 5, 2007. The investigation of the loading dock continued on June 5, 2007 with a hand auger being used to access the materials inside the dock structure exposed by the removal of the concrete cores. Two locations were accessed and following his examination of the recovered materials, OSC Turner determined that no additional actions were warranted. OSC Turner, IEPA Mike Grant and START Bob Hill subsequently departed from the Site. CRA and Brandenburg completed several activities, including restoring the dock surface, and securing 4 of the 5 investigation locations for the liquid investigation, before demobilizing from the Site;
- For the week of June 11, 2007, the primary focus of Site-related activities was the drafting the required reports for the previous week's activities and coordinating/monitoring the management of the liquids that had been removed from the Site. Additionally, The Respondents prepared and submitted the required notification letter to the Texas Commission of Environment al Quality (TCEQ) regarding the pending shipment of the recovered liquids from the Site to the CH Deer Park, Texas facility for disposal. The notification letter was submitted on June 14, 2007. No Site visit was schedule for the week; and
- The continued report preparation and waste scheduling activities were again the primary activity for the week of June 18, 2007. Another Site-related activity was the preparation of the monthly Status Report and attachments for the June 29, 2007 submission date. Again, no Site visits were scheduled or completed during the week.

Additional details of the completed activities, including Site maps, are provided in the form of the Weekly Summary Reports that are included as Appendices to this report. Those reports are presented as follows: Appendix A – Weekly Summary of Site Activities for May 28 – June 1, 2007; Appendix B – Weekly Summary of Site Activities for June 4 – 8, 2007; Appendix C – Weekly Summary of Site Activities for June 11 - 15, 2007; and Appendix D – Weekly Summary of Site Activities for June 18 – 22, 2007.

1.2 SAMPLING AND ANALYSIS

Severn Trent Laboratories (STL) of St. Louis, Missouri replaced RTI Laboratories of Livonia, Michigan (RTI) as the laboratory of record for the Removal Action under request by the Respondents. This request was approved by OSC Turner on April 20, 2006. However, TEK-Lab, Inc. of Collinsville, Illinois (TEK-Lab) has been used for the performance of waste characterization sample analysis to assist with/complete waste disposal activities.

On Tuesday, June 5, 2007, CRA and Brandenburg personnel collected a waste characterization sample of the liquids that had been recovered from the openings to the subsurface structure. This sampling was done to provide needed information for the completion of the waste acceptance process by Clean Harbors. A sample of the liquids contained in the tanker truck was obtained using a Coliwasa tube sampler and placed into two 8-ounce glass sample jars. The sample was collected at approximately 4:30 p.m. Following sample collection, the sample jars were prepared for transport, and taken to TEK-Lab for flash point and volatile organic compound (VOC) analysis. No other samples were collected during the reporting period.

The analytical results from the June 5, 2007 sample were received on June 8, 2007. It was noted during the review of the data that the reported flashpoint was 170 degrees Fahrenheit (°F). As such, the liquid was not an ignitable liquid and subsequently did require a D001 waste code assignment for shipping purposes. A copy of these results is included as Appendix E of this report.

1.3 REMOVAL ACTION WORK

Several actions have been undertaken towards completing the Removal Action at the RRG/Clayton Chemical Site during the reporting period. An outline of the completed actions was discussed above in Section 1.1 of this report. Additional details of the activities performed are presented in the Weekly Activity Summaries included as Appendices A through D of this report. Additionally, the activities completed during the week of June 4, 2007 are presented in greater detail in the included Liquid Removal and Investigation Report and the Waste Drum Storage Building Loading Dock Investigation Report. These reports are included as Appendices F and G, respectively.

2.0 ENCOUNTERED PROBLEMS, RESOLUTIONS, AND ANTICIPATED PROBLEMS

Upon mobilizing to the Site on June 4, 2007, CRA was alerted to the fact that the expected liquid wastes from the subsurface structure had not been approved for disposal at the CH Deer Park, TX facility by the CH Waste Approvals Group. The given reason for the non-approval was that the flash point from the March 16, 2007 liquid sample (130 °F) could not be resolved against the other available analytical data for VOC concentrations in the sample. Following several discussions with the CH Waste Approvals Group, the most feasible action to resolve the matter was determined to be the collection of a second sample and the subsequent analysis of that sample. CRA and Brandenburg collected a sample of liquids from the Triad tanker truck and delivered it to TEK-Lab for analysis. As stated previously, the flash point of the second sample indicated that the waste was not an ignitable liquid based on a flash point of 170°F.

The time delay for obtaining the results of the June 5, 2007 sample, in conjunction with the AOC requirement that an intended disposal facilities had to obtain U.S. EPA certification as being acceptable prior to being used, resulted in the waste needing to enter various 10-day interim storage facilities. Additional details on the eventual routing of the waste load are provided in the Liquid Removal and Investigation Report included as Appendix F of this report.

No other significant technical problems were encountered during the reporting period. Similarly, no technical problems or issues are anticipated for the upcoming period.

3.0 ANALYTICAL DATA GENERATED/RECEIVED

As stated in Section 1.2, a second waste characterization sample was collected from the tanker truck for CH usage. That sample was analyzed for flashpoint and VOCs by TEK-Lab. The Respondents received an electronic copy of the analytical report on June 8, 2007. A copy of the report is included as Appendix E.

4.0 ANTICIPATED ACTIVITIES FOR UPCOMING REPORT PERIOD

4.1 SITE PLANS

During the upcoming reporting period (June 25, 2007, through July 20, 2007), the following activities are anticipated:

- A Secondary Response Plan may be developed and submitted to U.S. EPA to present any additional actions stemming from the investigation of the subsurface structure;
- Removal for the remaining wood waste roll off container will/may be scheduled;
- Miscellaneous Site cleanup activities will be completed, as needed, based on the progress of the activities discussed above and weather conditions; and
- Site restoration activities, weather permitting, will be completed.

4.2 SAMPLING AND ANALYSIS

No sampling is anticipated during the upcoming reporting period.

4.3 REMOVAL ACTION WORK

Among the activities expected to be performed and/or completed during the upcoming report period are the determination of the appropriate follow up actions for the subsurface liquids area, the removal of wood waste from the Site for disposal at the Milam Landfill facility in East St. Louis, Illinois and limited Site restoration activities. An anticipated schedule for these activities appears below.

5.0 ANTICIPATED SCHEDULE

Activity	*Duration*	*Expected Start Date*
Install Stormwater Control Measures	As needed/ongoing	June 25, 2007
Continue Technical Design and Construction Scheduling of Proposed Landfill Cap	Ongoing/30 days	June 25, 2007
Initiate Wood Waste Removal Activities	Ongoing/30 days	June 25,, 2007
Initiate Site Restoration Activities	Ongoing/30 days	June 25,, 2007
Submit Status Report # 21	1 day	July 31, 2007

Attachments

FIGURE 1

SITE MAP

EZ1

EZ2A

EZ2B

EZ3

EZ4

EZ5

PARCEL ID 01-26.0-100-011
D.B. 2506 PG. 1616

PARCEL ID 01-26.0-100-005
D.B. 2491 PG. 403

N 29°53'19" E, 365.83'

S 29°53'19" W, 366.93'

S 29°53'19" W, 500.00'

S 60°06'41" E, 350.00'

N 60°06'41" W, 349.34'

N 45°07'16" E, 380.08'

S 60°06'41" E, 249.67'

0 20 60ft

LEGEND

- CABLE SERVICE BOX
- CLEANOUT
- ELECTRIC SERVICE BOX
- FAUCET
- FIRE HYDRANT
- GAS DRIP
- GAS VALVE
- GUIDEPOST
- LIGHT STANDARD
- MAILBOX
- SIGN
- MANHOLE
- OLD IRON PIPE
- POWER POLE
- GUY WIRE
- PIPE BRIDGE FOUNDATION
- SEWER VENT
- WATER MANHOLE
- SMALL VAT POTS IN PROCESS AREA (<5'X5')
- TANKS WITH "WEEPING"
- TANKS WITH SOLIDS REMAINING

figure 1

SITE WORKZONE LAYOUT MAP
RRG CLAYTON CHEMICAL
Sauget, Illinois

42192-00(SOURCE)GN-CO008 MAR 27/2006

APPENDIX A

WEEKLY SUMMARY OF SITE ACTIVITIES FOR MAY 28 – JUNE 1, 2007

CONESTOGA-ROVERS & ASSOCIATES

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee

REF. NO.: 042192-03

FROM: Garth Daley/ko/100

DATE: June 29, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
M. Sivek

RE: Weekly Summary Of Site Activities For May 28 – June 1, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the seventy-eighth week (the period May 28 through June 1, 2007) is presented below.

Date	*Tasks*	*Activity*
May 28, 2007	Mobilization Activities	No activity due to Memorial Day holiday
	Project Coordination	No activity due to Memorial Day holiday
	Site Preparation	No activity due to Memorial Day holiday
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920′ of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity due to Memorial Day holiday
May 29, 2007	Mobilization Activities	No activity

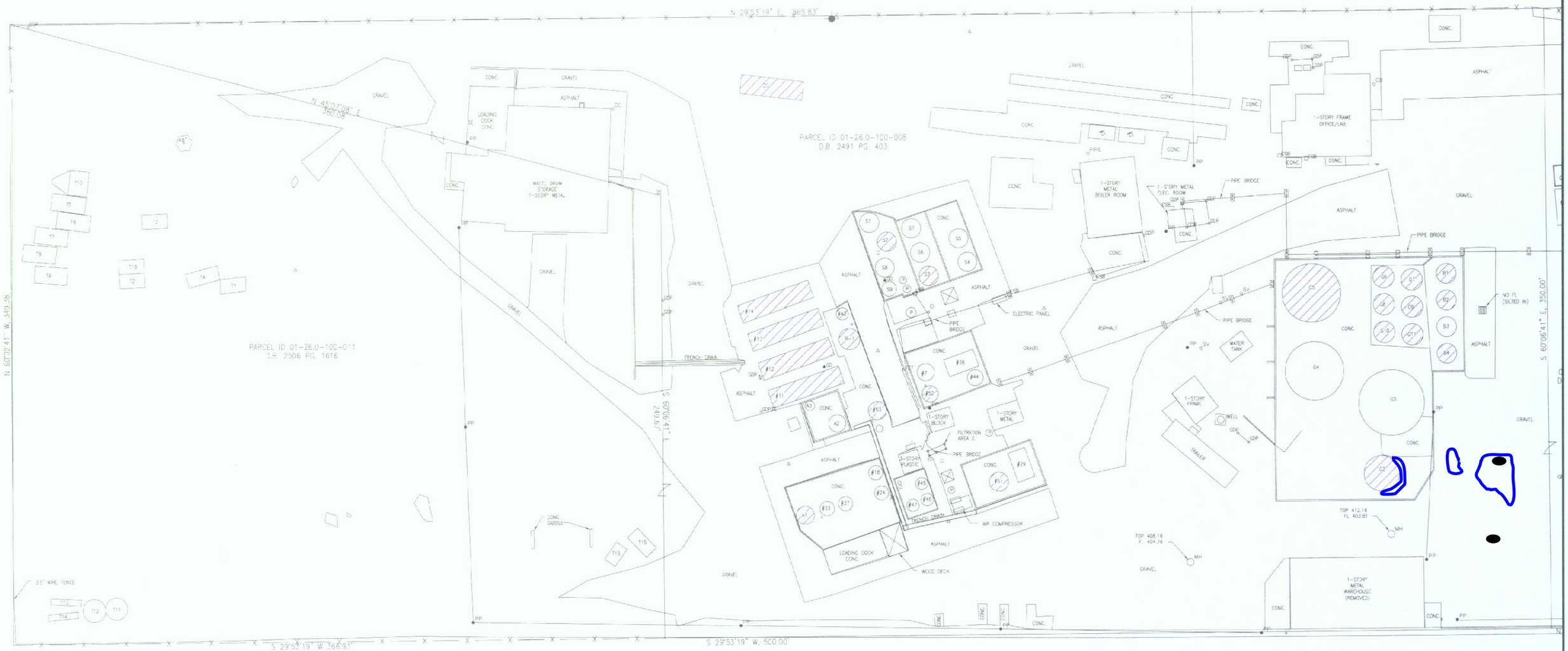
Date	*Tasks*	*Activity*
May 29, 2007	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities
May 30, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities
May 31, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity

Date	*Tasks*	*Activity*
May 31, 2007	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities
June 1, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents submitted two sets of information to U.S. EPA for the certification of the 2 potential disposal facilities for the planned liquid removal activities. OSC Turner contacted The Respondents to obtain additional details for the scheduled mobilization during the week of June 4, 2007. START Bob Hill was contacted by CRA to discuss the planned schedule of activities for the week of June 4, 2007. START Hill has contacted IEPA Mike Grant and made him aware of the expected activities and schedule
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

Date	*Tasks*	*Activity*
June 1, 2007	Miscellaneous	The Respondents continued discussions with possible subcontractors to facilitate mobilization to the Site for the week of June 4, 2007, to complete the proposed oil removal/investigation activities

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment



LEGEND

CSB	CABLE SERVICE BOX	PP	POWER POLE
CO	CLEANOUT		GUY WIRE
ESB	ELECTRIC SERVICE BOX		PIPE BRIDGE FOUNDATION
FC	FAUCET	SV	SEWER VENT
	FIRE HYDRANT	WMH	WATER MANHOLE
GD	GAS DRIP	(P)	SMALL VAT POTS IN PROCESS AREA (<5'X5')
GV	GAS VALVE		TANKS WITH "WEEPING"
GDP	GUIDEPOST		TANKS WITH SOLIDS REMAINING
	LIGHT STANDARD		
	MAILBOX		
	SIGN		
MH	MANHOLE		
OP	OLD IRON PIPE		

Approximate Oil Dri area

Opening exposing subsurface liquid

0 20 60ft

figure 1

SITE WORKZONE LAYOUT MAP
RRG CLAYTON CHEMICAL
Sauget, Illinois

APPENDIX B

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JUNE 4 – 8, 2007

CONESTOGA-ROVERS & ASSOCIATES

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO:	RRG/Clayton Chemical Site Technical Committee	REF. NO.:	042192-03
FROM:	Garth Daley/ko/97	DATE:	June 29, 2007
C.C.:	Sharon Newlon P. Harvey R. Shepherd B. Schloessler P. Pathak		

RE: Weekly Summary Of Site Activities For June 4 – June 8, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the seventy-ninth week (the period June 4, 2007 through June 8, 2007) is presented below.

Date	*Tasks*	*Activity*
June 4, 2007	Mobilization Activities	Brandenburg and CRA mobilized to the Site. Equipment mobilized to the Site include a tracked Bobcat T300 Turbo skid-steer loader, a portable generator, and a hydraulic coring machine with an 8-inch diameter corer/cutting head were mobilized to the Site
	Project Coordination	START Tom Binz and Bob Hill were on Site to observe work activities. The Respondents were informed by OSC Turner that the Clean Harbors Twinsburg facility was certified as an U.S. EPA-acceptable disposal facility
	Site Preparation	Brandenburg performed vegetation removal at select portions of the Site in preparation for the Drum Building dock investigation activities. Brandenburg also reactivated water supply to the Site
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006

Date	*Tasks*	*Activity*
June 4, 2007	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA marked eight proposed core drilling locations on the Drum Building Loading Dock with spray paint. Brandenburg partially loaded out the wood waste pile located southeast of EZ 4 into the 40-cubic yard (40-yd^3) roll off box located west of the northwest corner of the EZ 4 Work Zone
June 5, 2007	Mobilization Activities	Brandenburg mobilized a CAT 307C mini-excavator equipped with a grading blade to the Site. A jackhammer/concrete breaker attachment was also mobilized for the excavator. Waste Management delivers a 40-yd^3 roll off box for loading wood waste and other debris
	Project Coordination	OSC Kevin Turner, START Bob Hill and Tom Binz, and IEPA Mike Grant were on Site to observe Site activities. IEPA Grant mentioned that he had not received copies of the most recent Status Report and CRA agreed to provide copies via e-mail
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

Date	*Tasks*	*Activity*
June 5, 2007	Miscellaneous	Triad Transport, Inc. of McAlester, Oklahoma (Triad) pumped approximately 1,500 gallons of liquid from the two openings using a vacuum truck in separate removal events. CRA and Brandenburg performed an area investigation in which 5 locations were chosen and accessed using a mini-excavator equipped with a jackhammer attachment. Only 1 of the locations contained liquid and the other locations were used to establish the extents of the subsurface liquid structure. Brandenburg also used a Bobcat to scrape away the overburden soils to determine the dimensions of the subsurface structure as being 6 feet wide by 95 feet long by an undetermined depth. A sample was collected from the liquids inside the tanker truck for waste characterization/approval purposes and taken to TEK-Lab for flashpoint and total volatile organic compounds analysis. OSC Turner inspected the proposed core drilling locations on the Drum Building Loading Dock. After observing the coring device in use, OSC directed CRA to complete core drilling at only five of the eight proposed locations. CRA was also told that, depending on the appearance of the materials exposed by the removed cores, only one location would be accessed by a hand auger with the inspection of the material to take place upon OSC Turner's return to the Site the following day. Waste Management removed one 40-yd^3 roll off box with wood waste, construction debris and non-hazardous waste for disposal at the Milam Landfill facility
June 6, 2007	Mobilization Activities	CRA and Brandenburg demobilized from the Site after completing investigation and limited restoration activities
	Project Coordination	OSC Kevin Turner, START Bob Hill and IEPA Mike Grant were on Site to observe Site activities before demobilizing
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007

Date	*Tasks*	*Activity*
June 6, 2007	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	Brandenburg used a hand auger at two of the five cored locations to a depth of 40 inches below ground surface (bgs). Upon inspection of the exposed material (no visual or olfactory evidence of impacted material), OSC Turner determined that no additional investigation was necessary and told Brandenburg that the locations could be repaired/restored. Brandenburg also secured the 4 of the 5 locations along the length of the exposed subsurface structure to prevent/minimize stormwater intrusion. The westernmost/fifth location was not secured as jackhammer only exposed concrete rubble. Brandenburg loaded the remaining wood waste into the 40-yd^3 roll off box
June 7, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
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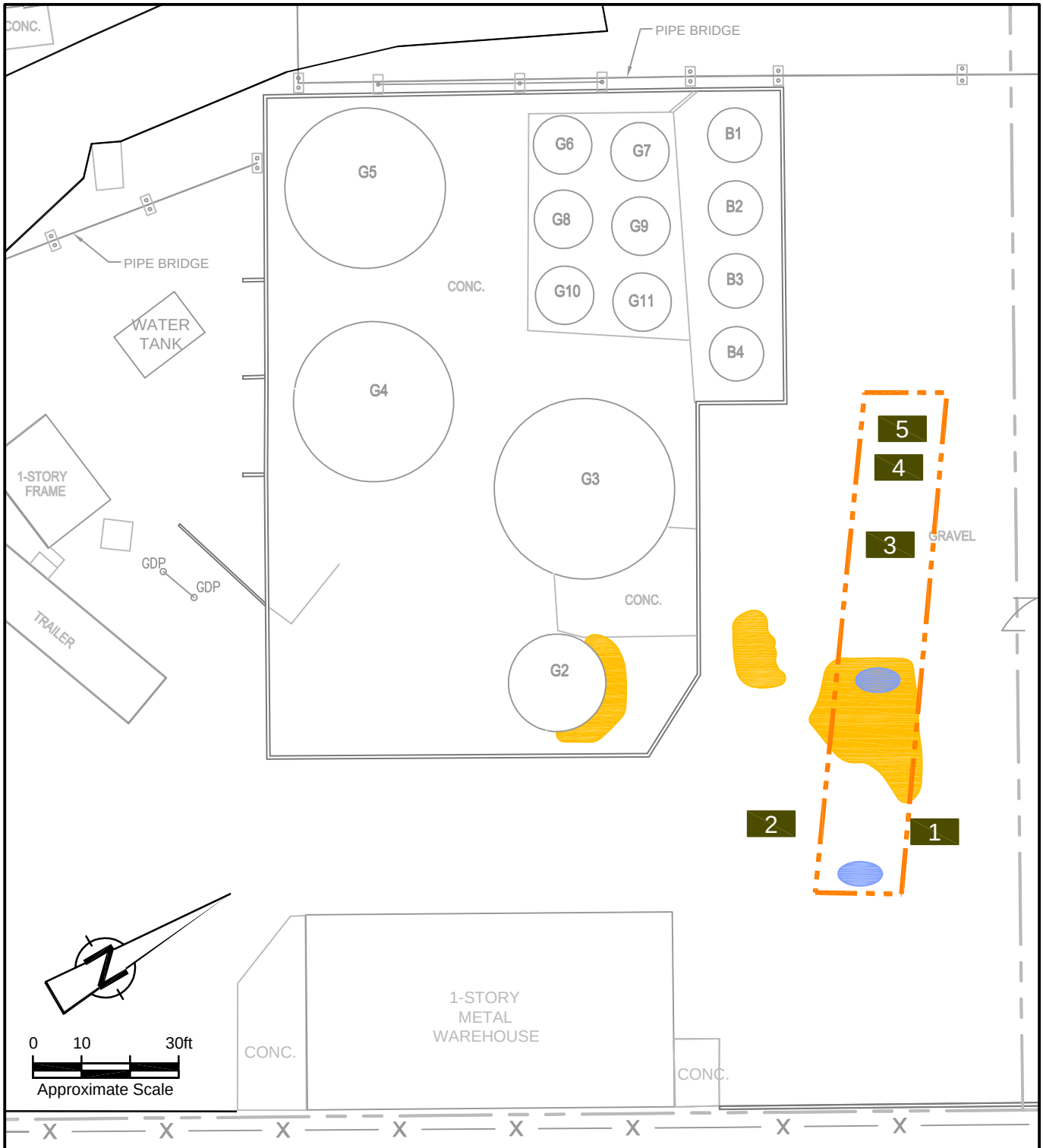
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No on Site activity
June 8, 2007	Mobilization Activities	No activity

Date	*Tasks*	*Activity*
June 8, 2007	Project Coordination	No on Site START presence due to no scheduled on Site activities. CRA contacted START Bob Hill and informed him of the receipt of the sample results
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA received the analytical results from the June 5th samples. The results establish that the liquids are not an ignitable liquid (no D001 waste code needed for waste transport/profiling). Following an overnight layover in the Triad McAlester, Oklahoma location, the liquids arrived at the Triad Houston, Texas interim storage facility, pending U.S. EPA approval of the Deer Park facility

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment



LEGEND:

- APPROXIMATE OIL DRI AREA
- OPENING EXPOSING SUBSURFACE LIQUID
- 1 — INVESTIGATION LOCATION
- APPROXIMATE OUTLINE OF EXPOSED SUBSURFACE STRUCTURE

figure 1

LIQUID INVESTIGATION AREA
RRG/CLAYTON CHEMICAL
Sauget, Illinois

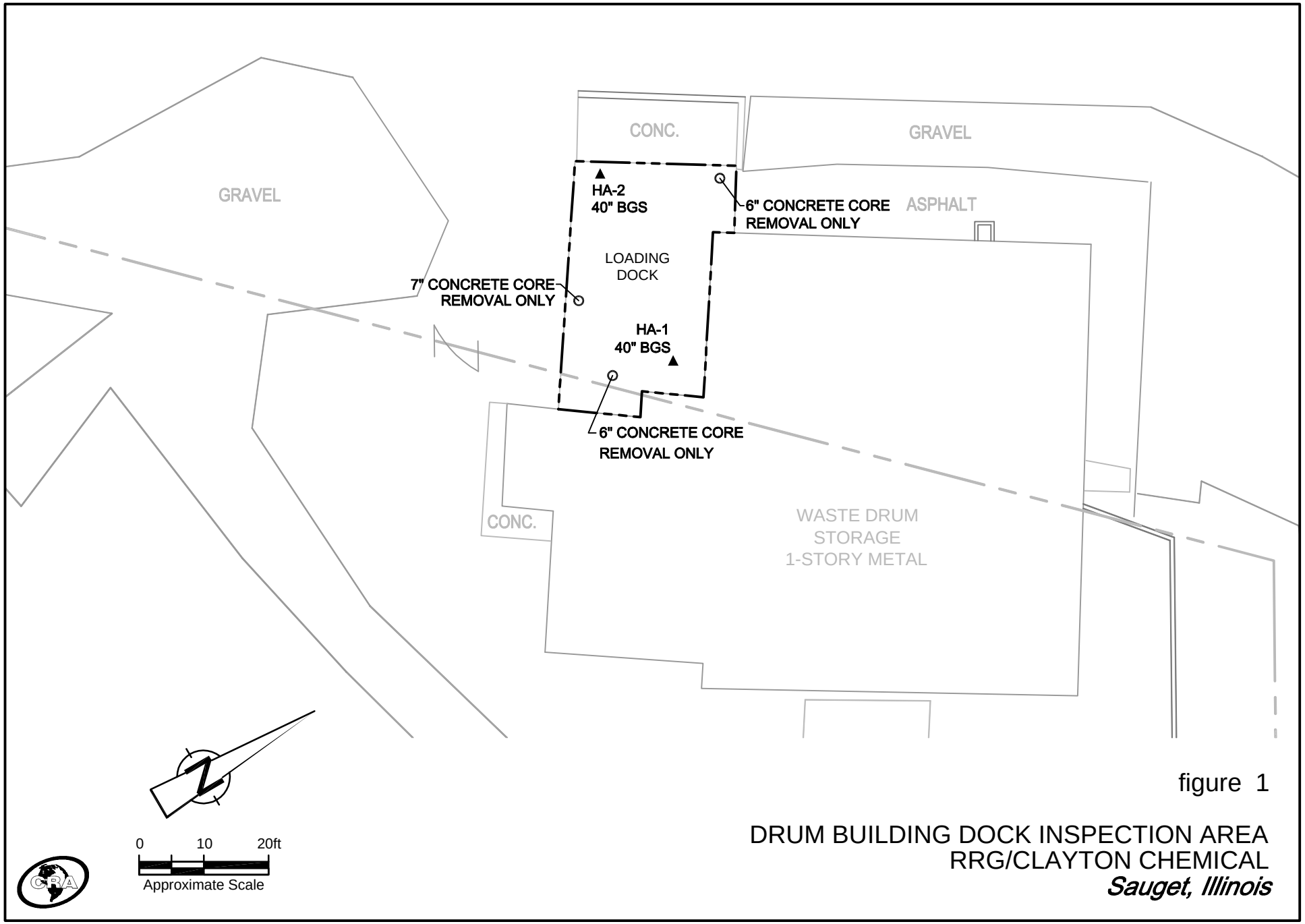


figure 1

DRUM BUILDING DOCK INSPECTION AREA
RRG/CLAYTON CHEMICAL
Sauget, Illinois

42192-03(MEMO096)GN-CO001 JUN 19/2007

APPENDIX C

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JUNE 11 – 15, 2007

CONESTOGA-ROVERS & ASSOCIATES

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee

REF. NO.: 042192-03

FROM: Garth Daley/ko/98

DATE: June 29, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
M. Sivek

RE: Weekly Summary Of Site Activities For June 11- 15, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the eightieth week (the period June 11 through June 15, 2007) is presented below.

Date	*Tasks*	*Activity*
June 11, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents were informed that the Clean Harbors Deer Park, TX facility had been certified as a U.S. EPA-approved disposal facility. CRA forwarded requested copies of previously submitted Status Reports to IEPA Mike Grant
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

Date	*Tasks*	*Activity*
June 11, 2007	Miscellaneous	The Respondents continue to arrange for disposal of the liquids removed from the Site on June 5, 2007. CRA begins preparation of the reports for the investigative activities from the week of June 5, 2007 continue
June 12, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continue to arrange for disposal of the liquids removed from the Site on June 5, 2007. Preparation of the reports for the investigative activities from the week of June 5, 2007 continue
June 13, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

Date	*Tasks*	*Activity*
June 13, 2007	Miscellaneous	The Respondents continue to arrange for disposal of the liquids removed from the Site on June 5, 2007. Preparation of the reports for the investigative activities from the week of June 5, 2007 continue
June 14, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. START Bob Hill was contacted by CRA for routine project update purposes. START Hill told CRA that Site conditions have not changed since June 8, 2007. CRA forwarded the requested copies of the previously submitted Status Reports to START Bob Hill. IEPA Mike Grant confirmed receipt of the Status Reports e-mailed on June 11, 2007. The Respondents submitted the required notification letter to Mr. Glenn Shankle of Texas Commission of Environmental Quality for the liquids recovered on June 5, 2007 and in transit to the Clean Harbors Deer Park, TX facility
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continue to arrange for disposal of the liquids removed from the Site on June 5, 2007. Preparation of the reports for the investigative activities from the week of June 5, 2007 continue
June 15, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007

Date	*Tasks*	*Activity*
June 15, 2007	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continue to arrange for disposal of the liquids removed from the Site on June 5, 2007. Preparation of the reports for the investigative activities from the week of June 5, 2007 continue

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

EZ1

EZ2A

EZ2B

EZ3

EZ4

EZ5

PARCEL ID 01-26.0-100-011
D.B. 2506 PG. 1616

PARCEL ID 01-26.0-100-005
D.B. 2491 PG. 403

N 29°53'19" E, 365.83'

S 29°53'19" W, 366.93'

S 29°53'19" W, 500.00'

S 60°06'41" E, 350.00'

N 60°06'41" W, 349.34'

N 45°07'16" E, 380.08'

S 60°06'41" E, 249.67'

0 20 60ft

LEGEND

- CABLE SERVICE BOX
- CLEANOUT
- ELECTRIC SERVICE BOX
- FAUCET
- FIRE HYDRANT
- GAS DRIP
- GAS VALVE
- GUIDEPOST
- LIGHT STANDARD
- MAILBOX
- SIGN
- MANHOLE
- OLD IRON PIPE
- POWER POLE
- GUY WIRE
- PIPE BRIDGE FOUNDATION
- SEWER VENT
- WATER MANHOLE
- SMALL VAT POTS IN PROCESS AREA (<5'X5')
- TANKS WITH "WEEPING"
- TANKS WITH SOLIDS REMAINING

figure 1

SITE WORKZONE LAYOUT MAP
RRG CLAYTON CHEMICAL
Sauget, Illinois

42192-00(SOURCE)GN-CO008 MAR 27/2006

APPENDIX D

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JUNE 18 – 22, 2007

CONESTOGA-ROVERS & ASSOCIATES

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO:	RRG/Clayton Chemical Site Technical Committee	REF. NO.:	042192-03
FROM:	Garth Daley/ko/99	DATE:	June 29, 2007
C.C.:	Sharon Newlon P. Harvey R. Shepherd B. Schloessler M. Sivek		

RE: Weekly Summary Of Site Activities For June 18- 22, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the eighty-first week (the period June 18 through June 22, 2007) is presented below.

Date	*Tasks*	*Activity*
June 18, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. START Bob Hill was provided with information on the quantities of shipped and treated PCB-impacted soils from the Site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

Date	*Tasks*	*Activity*
June 18, 2007	Miscellaneous	The Respondents continue to arrange for disposal of the liquids removed from the Site on June 5, 2007. The tanker was shipped from the Triad Houston, TX 10-day interim storage facility to the Veolia Baytown, TX 10-day interim storage facility pending the availability of a disposal "slot" at the Clean Harbors Deer Park facility. Preparation of the reports for the investigative activities from the week of June 5, 2007 continue
June 19, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents were informed by Clean Harbors that a disposal "slot" was available on June 22, 2007 for the liquids recovered on June 5, 2007. Preparation of the reports for the investigative activities from the week of June 5, 2007 continue
June 20, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site

Date	*Tasks*	*Activity*
June 20, 2007	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continue to arrange for disposal of the liquids removed from the Site on June 5, 2007. Preparation of the reports for the investigative activities from the week of June 5, 2007 continue
June 21, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. START Bob Hill was contacted by CRA for routine project update purposes and was told that Site conditions have not changed since June 8, 2007
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920′ of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents continue to arrange for disposal of the liquids removed from the Site on June 5, 2007. Preparation of the reports for the investigative activities from the week of June 5, 2007 continue
June 22, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920′ of piping have been removed and shipped off Site

Date	*Tasks*	*Activity*
June 22, 2007	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The liquids removed from the Site on June 5, 2007 are delivered to the Clean Harbors Deer Park, TX facility for final disposal. Subsequent to delivery, CRA was informed that the delivered materials were not consistent with the waste profile (waste was a sludge versus a liquid). Preparation of the reports for the investigative activities from the week of June 5, 2007 continue

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

EZ1

EZ2A

EZ2B

EZ3

EZ4

EZ5

PARCEL ID 01-26.0-100-011
D.B. 2506 PG. 1616

PARCEL ID 01-26.0-100-005
D.B. 2491 PG. 403

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LEGEND

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- CLEANOUT
- ELECTRIC SERVICE BOX
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- GAS VALVE
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- PIPE BRIDGE FOUNDATION
- SEWER VENT
- WATER MANHOLE
- SMALL VAT POTS IN PROCESS AREA (<5'X5')
- TANKS WITH "WEEPING"
- TANKS WITH SOLIDS REMAINING

figure 1

SITE WORKZONE LAYOUT MAP
RRG CLAYTON CHEMICAL
Sauget, Illinois

42192-00(SOURCE)GN-CO008 MAR 27/2006

APPENDIX E

ANALYTICAL REPORT FOR JUNE 5, 2007 LIQUID SAMPLE

TEKLAB, INC.

5445 HORSESHOE LAKE ROAD
COLLINSVILLE, ILLINOIS 62234

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004
FAX: 618-344-1005

June 08, 2007

Garth Daley
Conestoga-Rovers & Associates
8615 West Bryn Mawr Avenue
Chicago, IL 60631-3501
TEL: (773) 380-9933
FAX: (773) 380-6421

ACCREDITED IN ACCORDANCE WITH nelac
NELAP Accredited #100226

RE: RRG/Clayton Chemical 042192-03 **Work Order:** 07060136

Dear Garth Daley:

TEKLAB, INC received 1 sample on 6/5/2007 6:25:00 PM for the analysis presented in the following report. A list of report contents can be found on the following page.

Samples are analyzed on an as received basis unless otherwise requested and documented. The sample results contained in this report relate only to the requested analytes of interest as directed on the chain of custody. IL ELAP and NELAP accredited fields of testing are indicated by the letters NELAP under the Certification column.

All quality control criteria applicable to the test methods employed for this project have been satisfactorily met and are in accordance with NELAP except where noted. The following report shall not be reproduced, except in full, without the written approval of Teklab, Inc.

If you have any questions regarding these tests results, please feel free to call.

Sincerely,

Heather A. White

Heather A. White
Project Manager
(618)344-1004 ex.20

TEKLAB, INC.

5445 HORSESHOE LAKE ROAD
COLLINSVILLE, ILLINOIS 62234

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004
FAX: 618-344-1005

REPORT CONTENTS

Client: Conestoga-Rovers & Associates
Project: RRG/Clayton Chemical 042192-03
LabOrder: 07060136
Report Date: 08-Jun-07

This reporting package includes the following:

TEKLAB, INC.

5445 HORSESHOE LAKE ROAD
COLLINSVILLE, ILLINOIS 62234

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004
FAX: 618-344-1005

Client: Conestoga-Rovers & Associates
Project: RRG/Clayton Chemical 042192-03
LabOrder: 07060136
Report Date: 08-Jun-07

CASE NARRATIVE

Cooler Receipt Temp: 23.2 °C

State accreditations:

IL: DPH #17584 NELAP #IL00045 | KS: NELAP #E-10347 | KY: UST #0073 | MO: DNR #00930 | AR: ADEQ #70-028-0

Qualifiers

DF - Dilution Factor	**B** - Analyte detected in the associated Method Blank	**C** - Client requested RL below
RL - Reporting Limit	**J** - Analyte detected below reporting limits	**D** - Diluted out of sample
ND - Not Detected at the Reporting Limit	**R** - RPD outside accepted recovery limits	**E** - Value above quantitation range
Surr - Surrogate Standard added by lab	**S** - Spike Recovery outside accepted recovery limits	**H** - Holding time exceeded
TNTC - Too numerous to count (> 200 CFU)	**X** - Value exceeds Maximum Contaminant Level	**MI** - Matrix interference
Q - QC criteria failed or noncompliant CCV	**#** - Unknown hydrocarbon	**DNI** - Did not ignite
NELAP - IL ELAP and NELAP Accredited Field of Testing	**IDPH** - IL Dept. of Public Health	

TEKLAB, INC.

5445 HORSESHOE LAKE ROAD
COLLINSVILLE, ILLINOIS 62234

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004
FAX: 618-344-1005

LABORATORY RESULTS

Client: Conestoga-Rovers & Associates
WorkOrder: 07060136
Lab ID: 07060136-001
Report Date: 08-Jun-07

Client Project: RRG/Clayton Chemical 042192-03
Client Sample ID: OIL-060507-PP-002
Collection Date: 6/5/2007 4:30:00 PM
Matrix: OIL

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
SW-846 1010								
Ignitability, Closed Cup	NELAP	60		170	°F	1	6/7/2007	BSJ
SW-846 5030, 8260B, VOLATILE ORGANIC COMPOUNDS BY GC/MS								
1,1,1,2-Tetrachloroethane		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,1,1-Trichloroethane		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,1,2,2-Tetrachloroethane		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,1,2-Trichloro-1,2,2-trifluoroethane		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,1,2-Trichloroethane		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,1-Dichloro-2-propanone		1000		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,1-Dichloroethane		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,1-Dichloroethene		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,1-Dichloropropene		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,2,3-Trichlorobenzene		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,2,3-Trichloropropane		200		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,2,3-Trimethylbenzene		100		688	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,2,4-Trichlorobenzene		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,2,4-Trimethylbenzene		100		1630	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,2-Dibromo-3-chloropropane		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,2-Dibromoethane		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,2-Dichlorobenzene		100		123	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,2-Dichloroethane		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,2-Dichloropropane		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,3,5-Trimethylbenzene		100		406	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,3-Dichlorobenzene		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,3-Dichloropropane		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1,4-Dichlorobenzene		100		210	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
1-Chlorobutane		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
2,2-Dichloropropane		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
2-Butanone		1000		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
2-Chlorotoluene		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
2-Hexanone		1000		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
2-Nitropropane		1000		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
4-Chlorotoluene		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
4-Methyl-2-pentanone		1000		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Acetone		1000		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Acrolein		2000		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Acrylonitrile		200		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Allyl chloride		100		ND	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR

TEKLAB, INC.

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COLLINSVILLE, ILLINOIS 62234

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004
FAX: 618-344-1005

LABORATORY RESULTS

Client: Conestoga-Rovers & Associates
WorkOrder: 07060136
Lab ID: 07060136-001
Report Date: 08-Jun-07

Client Project: RRG/Clayton Chemical 042192-03
Client Sample ID: OIL-060507-PP-002
Collection Date: 6/5/2007 4:30:00 PM
Matrix: OIL

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
SW-846 5030, 8260B, VOLATILE ORGANIC COMPOUNDS BY GC/MS								
Benzene		40.0		**68.2**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Bromobenzene		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Bromochloromethane		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Bromodichloromethane		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Bromoform		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Bromomethane		200		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Butyl acetate		1000		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Carbon disulfide		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Carbon tetrachloride		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Chlorobenzene		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Chloroethane		200		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Chloroform		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Chloromethane		200		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Chloroprene		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
cis-1,2-Dichloroethene		100		**216**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
cis-1,3-Dichloropropene		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
cis-1,4-Dichloro-2-butene		200		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Cyclohexanone		2000		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Dibromochloromethane		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Dibromomethane		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Dichlorodifluoromethane		200		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Ethyl acetate		1000		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Ethyl ether		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Ethyl methacrylate		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Ethylbenzene		100		**258**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Heptane		400		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Hexachlorobutadiene		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Hexachloroethane		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Hexane		400		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Iodomethane		200		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Isopropylbenzene		100	J	**83**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
m,p-Xylenes		100		**1370**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Methacrylonitrile		1000		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Methyl Methacrylate		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Methyl tert-butyl ether		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Methylacrylate		200		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Methylene chloride		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Naphthalene		200		**894**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR

TEKLAB, INC.

5445 HORSESHOE LAKE ROAD
COLLINSVILLE, ILLINOIS 62234

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004
FAX: 618-344-1005

LABORATORY RESULTS

Client: Conestoga-Rovers & Associates
WorkOrder: 07060136
Lab ID: 07060136-001
Report Date: 08-Jun-07

Client Project: RRG/Clayton Chemical 042192-03
Client Sample ID: OIL-060507-PP-002
Collection Date: 6/5/2007 4:30:00 PM
Matrix: OIL

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
SW-846 5030, 8260B, VOLATILE ORGANIC COMPOUNDS BY GC/MS								
n-Butylbenzene		100		**311**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Nitrobenzene		2000		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
n-Propylbenzene		100		**146**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
o-Xylene		100		**600**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Pentachloroethane		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
p-Isopropyltoluene		100	J	**50**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Propionitrile		1000		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
sec-Butylbenzene		100	J	**74**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Styrene		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
tert-Butylbenzene		100	J	**51**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Tetrachloroethene		100	J	**23**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Tetrahydrofuran		1000		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Toluene		100		**3100**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
trans-1,2-Dichloroethene		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
trans-1,3-Dichloropropene		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Trichloroethene		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Trichlorofluoromethane		100		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Vinyl acetate		1000		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Vinyl chloride		40.0		**ND**	mg/Kg	2000	6/7/2007 2:22:00 PM	LMR
Surr: 1,2-Dichloroethane-d4		72.8-122		**95.8**	%REC	2000	6/7/2007 2:22:00 PM	LMR
Surr: 4-Bromofluorobenzene		75.6-120		**96.2**	%REC	2000	6/7/2007 2:22:00 PM	LMR
Surr: Dibromofluoromethane		74.1-121		**97.0**	%REC	2000	6/7/2007 2:22:00 PM	LMR
Surr: Toluene-d8		82.8-112.8		**106.3**	%REC	2000	6/7/2007 2:22:00 PM	LMR

Sample Narrative

SW-846 5030, 8260B, Volatile Organic Compounds by GC/MS

Elevated reporting limit due to high levels of target and/or non-target analytes.

07060136

CONESTOGA-ROVERS & ASSOCIATES
8615 W. Bryn Mawr Avenue
Chicago, Illinois 60631
(773)380-9933 phone
(773)380-6421 fax

SHIPPED TO (Laboratory Name): TEK LABS

REFERENCE NUMBER: 04192-03

PROJECT NAME: BRC / CLAYTON CHEMICAL Site

CHAIN-OF-CUSTODY RECORD

SAMPLER'S SIGNATURE: [signature] **PRINTED NAME:** Pritesh P. Pathak

SEQ. No.	DATE	TIME	SAMPLE IDENTIFICATION No.	SAMPLE MATRIX	No. OF CONTAINERS	PARAMETERS (per Heather White, analyze for VOC & FP)	REMARKS
	6/5/07	1830	OIL-060507-PP-002	OIL	2		07060136-001 SEE DAVE HENDREN E-MAIL FOR ANALYTICAL
						3 DAY	
			TOTAL NUMBER OF CONTAINERS		2		

RELINQUISHED BY: ① [signature]	DATE: 6-5-07 TIME: 1800	RECEIVED BY: ② Marwin L. Dorley II	DATE: 6/5/07 TIME: 1825
RELINQUISHED BY: ②	DATE: TIME:	RECEIVED BY: ③	DATE: TIME:
RELINQUISHED BY: ②	DATE: TIME:	RECEIVED BY: ④	DATE: TIME:

METHOD OF SHIPMENT: DELIVERY **AIR BILL No.**

White -Fully Executed Copy
Yellow -Receiving Laboratory Copy
Pink -Shipper Copy
Goldenrod -Sampler Copy

SAMPLE TEAM: P. Pathak, G. Daley

RECEIVED FOR LABORATORY BY: Marwin L. Dorley II
DATE: 6/5/07 TIME: 1825

№ 2299

1001-00(SOURCE)GN-CO004

TEKLAB, INC

Sample Receipt Checklist

Client Name	CONESTOGA-ROVERS & AS	Date and Time Received:	6/5/2007 6:25:00 PM
Work Order Number	07060136	Date Due:	6/8/2007
QC Level	LVL2	Received by	MLD

Checklist completed by: Marvin L. Darling II
On: 6/6/2007
Marvin L. Darling

Checklist Reviewed by: Elizabeth A. Hurley
On: 6/6/2007
Elizabeth A. Hurley

Matrix: Carrier name P. Pathak

Shipping container/cooler in good condition?	Yes	☑	No	☐	Not Presen	☐	
Custody seals intact on shippping container/cooler?	Yes	☐	No	☐	Not Presen	☑	
Custody seals intact on sample bottles?	Yes	☐	No	☐	Not Presen	☑	
Ice?	None	☐	Water	☑	Blue Ice	☐	Temp °C 23.2
Chain of custody present?	Yes	☑	No	☐			
Chain of custody signed when relinquished and received?	Yes	☑	No	☐			
Chain of custody agrees with sample labels?	Yes	☑	No	☐			
Samples in proper container/bottle?	Yes	☑	No	☐			
Sample containers intact?	Yes	☑	No	☐			
Sufficient sample volume for indicated test?	Yes	☑	No	☐			
All samples received within holding time?	Yes	☑	No	☐			
Container/Temp Blank temperature in compliance?	Yes	☑	No	☐			

When thermal preservation is required, samples are compliant with a temperature between 0.1°C - 6.0°C, or when samples are received on ice the same day as collected.

Water - VOA vials have zero headspace?	No VOA vials submitted	☑	Yes	☐	No ☐
Water - pH acceptable upon receipt?	Yes	☑	No	☐	

Any No and/or NA response must be detailed below or on the COC.

07060136

APPENDIX F

LIQUID REMOVAL AND INVESTIGATION PLAN

CONESTOGA-ROVERS & ASSOCIATES

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO:	Ms. Sharon Newlon	REF. NO.:	042192-03
FROM:	Garth Daley/ko/95	DATE:	June 29, 2007
C.C.:	RRG/Clayton Technical Committee, R. Shepherd, P. Harvey		
RE:	**Liquid Removal and Investigation Summary**		

INTRODUCTION

This memorandum provides a description of activities completed during the week of June 4, 2007, at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site in Sauget, St. Clair County, Illinois. A photolog providing visual documentation of completed activities is provided as Attachment A.

During a routine Site visit on March 16, 2007, to inspect a hazardous waste accumulation area at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site in Sauget, St. Clair County, Illinois, personnel from Conestoga-Rovers & Associates (CRA) discovered the presence of a subsurface liquid at the northeast portion of the Site. Conditions at the opening indicated that:

- the liquid was a mixture of oil and water that was overlain by a concrete slab containing steel reinforcing bars (rebars) and roughly three inches thick;
- that the slab was beneath a soil layer measuring roughly two inches thick;
- that the liquid level was roughly five to six inches below ground surface (bgs);
- that the liquid depth was roughly eight to nine inches; and
- that from probing the opening with a stick, there appeared to be a solid bottom/base beneath the liquid.

Following the discovery, Oil Dri™ was applied over visibly impacted surface soils and a sample of the liquid was collected, and submitted to TEK-Lab, Inc. of Collinsville, Illinois (TEK-Lab) for waste characterization analysis. The United States Environmental Protection Agency (U.S. EPA) was also made aware of the situation through a voicemail message, which was left for Superfund Technical Assistance and Response Team (START) member Bob Hill. Based on the resultant analytical results, several waste management contractors/providers were contacted to manage the material.

During another Site visit on March 23, 2007, a second opening was discovered to the east of the first opening. Conditions at that location were almost identical to those at the first location, except no rebar was noted. Due to this similarity, no additional sample was collected, and since no additional areas of visually impacted soils were noted, no additional Oil Dri™ was applied. The two original openings that were discovered during the March 2007 Site inspections are highlighted in blue on the attached Figure 1.

Subsequent to this discovery, CRA prepared an Oil Response Plan on behalf of RRG/Clayton Solids Removal Group (The Group), with the plan being submitted to U.S. EPA via electronic mail (e-mail) on April 19, 2007. Following approval of the proposed activities by U.S. EPA/Federal On-Scene Coordinator (OSC) Kevin Turner and the determination of mutually acceptable timeframes for completing the oil removal and investigation activities, negotiations continued with various target waste management contractors. Eventually, Veolia Environmental Services, Inc. (Veolia) was selected as the waste hauler, Clean Harbors, Inc. (CH) was chosen to provide a disposal facility for the management of the liquids, and the week of June 4, 2007, was approved as the timeframe for completion of the project. Brandenburg Industrial Service Company, Inc. of Chicago, Illinois (Brandenburg) continued to be the lead Removal Contractor for the performed activities.

LIQUID REMOVAL AND INVESTIGATION

Liquid Removal

On June 5, 2007, Triad Transport, Inc. of McAlester, Oklahoma (Triad), a waste hauler subcontracted by Veolia, utilized vacuum extraction to pump approximately 1,500 gallons of liquid from the two openings in separate removal events. The majority of the liquid was recovered from the western opening. The liquid was pumped directly into a tanker truck to the maximum extent practicable and follow up arrangements were made regarding the scheduled transportation and off-Site disposal of the recovered liquids.

To complete the information needed for waste acceptance by CH, a second characterization sample of the material contained in the Triad tanker truck was collected. From the observed sample, it was estimated that the oil to water ratio for the recovered material was roughly 10 percent oil to 90 percent water (10% oil:90% water). To minimize the time delay for generating the sample results, and to allow U.S. EPA additional time to approve the use of the CH Deer Park, TX facility for disposal purposes, the Triad tanker truck was dispatched to the 10-day interim storage facility operated by Triad in McAlester, Oklahoma.

The Group received notification from OSC Turner on Monday, June 11, 2007, that the CH Deer Park, TX incinerator was approved by U.S. EPA Region V as an acceptable/approved disposal facility.

Investigation of the Subsurface Structure

Following removal of the liquid from the two openings, CRA completed an investigation of the subsurface structure to determine the horizontal areal extent of the structure. The investigation started with the expansion of the eastern opening, which revealed the presence of apparent concrete walls within six inches of the eastern extent of the second/eastern opening, and a similarly constructed wall roughly one foot to the south. The expansion of the second/eastern opening was completed using a mini-excavator equipped with a concrete breaker attachment. Based on the visual evidence, OSC Turner subsequently agreed that the eastern opening discovered during the March 23, 2007, Site inspection was likely the eastern extent of the subsurface structure. One noted condition following the expansion of the second opening was that the sound of the vacuum from the hose at the first opening was evident/obvious, indicating that the two openings were linked by a continuous void. CRA then directed Brandenburg to remove overburden soil material at one location northwest of the eastern opening and at one location southwest of the eastern opening. Brandenburg subsequently utilized a concrete breaker to penetrate the exposed concrete surface to a depth of approximately four to six inches bgs to estimate the width of the structure and/or to afford

inspection of the structure for the presence of additional oil. CRA did not observe any visual or olfactory evidence of oil at either of these two investigative locations, and concluded that the structure did not extend beyond the previously assumed southern wall. These two locations are identified as investigation location #1 and investigation location #2 on Figure 1.

Following confirmation that the subsurface structure did not appear to extend north of investigation location #1 or south of investigation location #2, CRA directed Brandenburg to remove overburden soils, including the areas previously covered with Oil Dri™, to afford visual confirmation that the suspected structure extended between the two openings. This action revealed the presence of a seemingly continuous concrete "slab-type" surface/covering above the suspected subsurface structure. Two parallel metal strips, installed 6 feet apart, were also exposed by the overburden removal actions. As the investigation area approached the first opening, evidence of localized paint residue was noted by OSC Turner. The removal of the overburden soils continued westward beyond the first opening until a distinct edge was encountered for the concrete surface. A third investigation location (Investigation Location #3) was selected west of the first opening, and Brandenburg was instructed to create an opening in the concrete surface. The resultant opening exposed rebar and a similar liquid to that found at the two original openings. This similarity of conditions confirmed/indicated that the structure extended west beyond the first opening. Two additional locations were selected between the third investigation location and the exposed edge of the concrete slab. The fourth location was selected due to the appearance of a circular mark in the concrete surface, and the fifth location was less than 10 feet from the western edge of the concrete slab. Again, the mini-excavator and the concrete breaker attachment were used to access these locations. No oil was observed in investigation location #4 and investigation location #5. CRA determined that the liquid was containerized in an apparent concrete structure having approximate dimensions of the 95 feet in length, a width of 6 feet, and an average depth of 2 to 3 feet bgs. At the eastern portion of the subsurface structure, a concrete slab measuring 8 or 12 feet in width is present for roughly 60 feet from the eastern edge of the liquid area. CRA utilized a T-handled steel probing device to estimate the depth to the bottom of the subsurface structure. The approximate layout/outline of the concrete structure, as well as the five investigative locations, are identified on Figure 1.

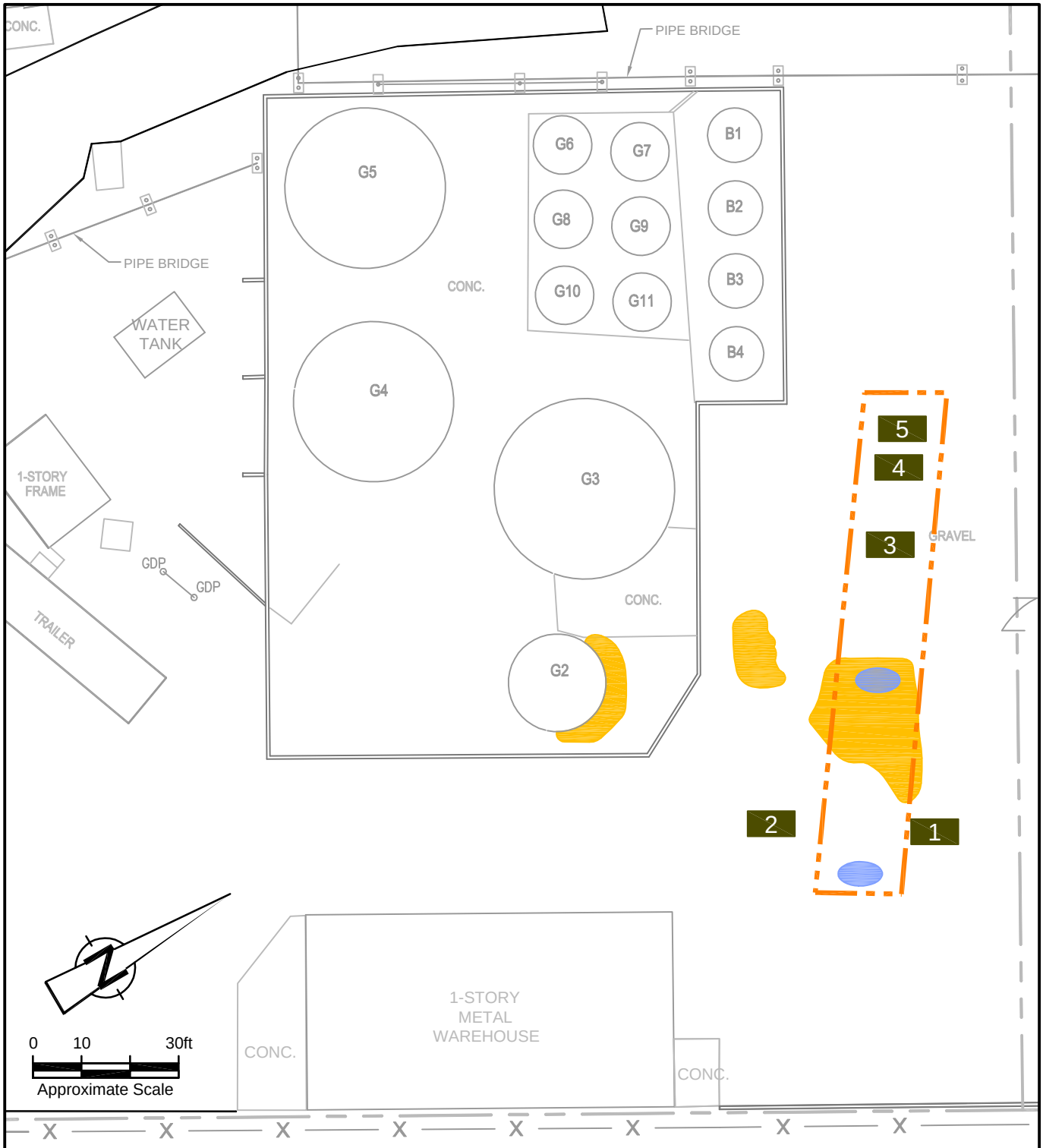
CRA did not proceed with any additional work activities, as the scheduled work outlined in the Group's original proposal dated January 29, 2007, and the proposed modification dated February 8, 2007, had been completed.

Restoration of Subsurface Structure Investigation Area

Following the completion of the subsurface investigation activities, the overburden soils were consolidated and staged just beyond the eastern edge of the concrete slab area. Polyethylene sheeting was placed under the stockpiled soil, then used as a cover material pending waste characterization and subsequent transportation and off-Site disposal of the staged soils. The two original openings from which liquid was extracted were also covered with plastic sheeting and secured in place with granular backfill material (CA-6 Aggline) recovered from other parts of the Site. Investigation location #3 and investigation location #4, located west of the first opening were also covered with plastic sheeting and secured in place with the available on-Site backfill material. No restoration was required at investigation location #5, as the jack hammering/accessing of that location produced only chunks of concrete. OSC Turner agreed that investigation location #5 represented the edge of the structure even though it was actually beyond the containment structure.

Transportation and off-Site Disposal

The material recovered from the subsurface structure was estimated to be 1,500 gallons and was transported by Triad truck # 2729 and trailer # 105. Following an overnight layover in the Triad McAlester, Oklahoma location, the waste was transported to the Triad Houston, Texas interim storage facility, arriving on Friday, June 8, 2007. Facility approval was received from U.S. EPA OSC Kevin Turner for the Deer Park, Texas facility on June 11, 2007. The tanker truck was shipped from the Triad Houston facility to the Veolia Baytown (Houston area) interim storage facility on June 18, 2007 due to the unavailability of a disposal "slot" at the CH Deer Park, TX facility. The material was delivered to the CH Deer Park on June 22, 2007.



LEGEND:

- APPROXIMATE OIL DRI AREA
- OPENING EXPOSING SUBSURFACE LIQUID
- 1 — INVESTIGATION LOCATION
- APPROXIMATE OUTLINE OF EXPOSED SUBSURFACE STRUCTURE

figure 1

LIQUID INVESTIGATION AREA
RRG/CLAYTON CHEMICAL
Sauget, Illinois

Resource Recovery Group/Clayton Chemical Company
Oil Investigation-June 5-6, 2007
Sauget, Illinois
CRA Project No. 042192

CONESTOGA-ROVERS & ASSOCIATES

Photo #1 View (facing west) of vacuum extraction of liquid from western opening discovered during March 2007.

Photo #2 View (facing east) of concrete breaker utilized to expand the eastern opening to facilitate the subsurface structure investigation.

Photo #3 View of localized paint residue observed on soils during the subsurface structure investigation.

Photo #4 View (facing east) of the exposed subsurface structure investigation area.

Resource Recovery Group/Clayton Chemical Company
Oil Investigation-June 5-6, 2007
Sauget, Illinois
CRA Project No. 042192

CONESTOGA-ROVERS & ASSOCIATES

Photo #5 View of exposed metal strip.

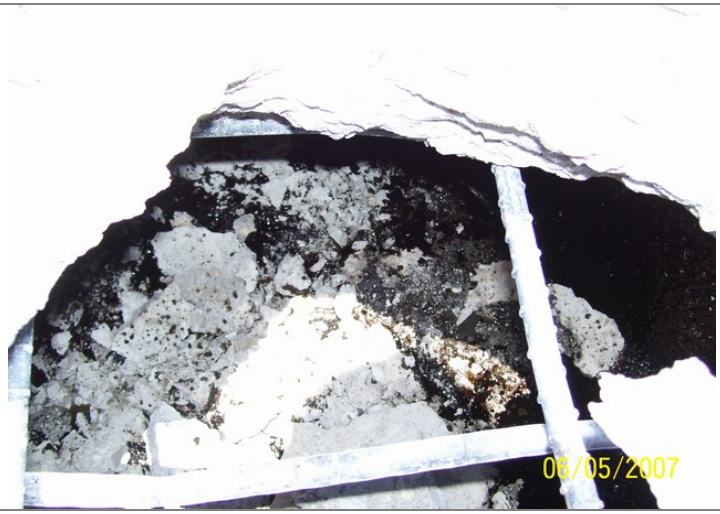


Photo #6 View of investigation location #3 identified on Figure 1. Liquid was observed in this location.

Photo #7 View of vacuum extraction of liquid from eastern opening (discovered March 2007 and expanded June 2007).

Photo #8 View of liquid sample collected from waste contained in the vacuum truck prior to the vacuum truck departing the Site.

Photo #9 View of soils at investigation location #4 identified on Figure 1. Only the soil seen under the plastic was observed at this location.

Photo #10 View (facing east) of the secured openings following the subsurface structure investigation.

APPENDIX G

WASTE DRUM STORAGE BUILDING LOADING DOCK INVESTIGATION REPORT

CONESTOGA-ROVERS & ASSOCIATES

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO:	Ms. Sharon Newlon	REF. NO.:	042192-03
FROM:	Garth Daley/ko/96	DATE:	June 27, 2007
C.C.:	RRG/Clayton Technical Committee, R. Shepherd, P. Harvey		
RE:	**Drum Building Loading Dock Inspection Summary**		

INTRODUCTION

This memorandum provides a description of activities completed during the week of June 4, 2007, at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site in Sauget, St. Clair County, Illinois. A photolog providing visual documentation of completed activities is provided as Attachment A.

Conestoga-Rovers & Associates (CRA), on behalf of RRG/ Clayton Solids Removal Group ("Group"), has completed the investigation of the loading dock structure associated with the Drum Building at the Site. The Drum Building dock inspection activities were completed in accordance with the January 9, 2007, proposal submitted to U.S. EPA and the February 8, 2007, proposed modifications. The activities also incorporated select suggestions presented in responses by U.S. EPA/OSC Kevin Turner to the proposed investigation activities. The work plan was approved by OSC Turner on March 21, 2007.

DRUM BUILDING DOCK INSPECTION

Concrete Core Drilling

From June 5-6, 2007, an inspection of the Drum Building loading dock, which is located immediately adjacent to the Drum Building, was completed at the Site. As outlined in the modified proposal submitted to U.S. EPA, dated February 8, 2007, the Group proposed to complete core drilling at eight locations on the Drum Building dock. To facilitate the planned activities, Brandenburg secured a hydraulic coring device and an 8-inch diameter coring attachment and mobilized the equipment to the Site on June 4, 2007.

On Monday, June 4, 2007, CRA marked the eight proposed locations with spray paint. OSC Turner inspected the proposed core drilling locations on June 5, 2007. After observing the advancing of the coring device at one of these selected locations, OSC Turner directed CRA to complete core drilling at only five of the eight proposed locations. The additional concrete coring activities were observed by Superfund Technical Assistance and Response Team (START) member Bob Hill, OSC Turner's designee for the RRG/Clayton Site. At four of the five locations, the core was removed and the resultant holes were secured by lids from 55-gallon drums that were weighted down by their removed cores. Each removed concrete core was approximately 6 to 7 inches thick. At the fifth location, the core was left in place pending OSC Turner's return to the Site the following day.

Hand Augering

On June 6, 2007, the second phase of the loading dock investigation continued with the inspection of the soils revealed by the removed concrete cores and the advancement of hand augered boreholes. The approximate concrete core drilling locations and hand augering locations are identified on Figure 1.

Brandenburg elected to hand auger two of the five cored locations to a depth of 40 inches below ground surface (bgs). As stated previously, each removed core was a roughly 6-inch concrete cylinder which was removed to expose the presence of plastic sheeting immediately below the concrete surface and a soil-like material below the plastic material. Using the hand auger, Brandenburg determined that this material was a black fine-grained fill material that was present to an approximate depth 34 inches below the base of the removed cores. The removed materials were placed on plastic sheeting pending inspection by OSC Turner. At the HA-1 location, the presence of a layer of gravel and brown soils, roughly 2 inches thick, was also revealed by the augering activities. CRA did not observe visual or olfactory evidence of impacted material at either location. The two hand auger locations (HA-1 and HA-2) are identified on Figure 1. Following inspection of the two hand auger locations, OSC Turner informed CRA that no further investigative activities would be required at the drum building dock.

Backfilling and Restoration

Brandenburg backfilled both hand auger locations with the removed soil spoils and placed the removed concrete cores back into all five core drilling locations. Following placement of the concrete cores, Quikrete precision grout was used by Brandenburg to seal the area around the concrete cores located within the Drum Building dock area. Photographs were taken to document the restoration activities and are presented in Attachment A. The repaired areas were re-inspected after roughly an hour to confirm that no excessive concrete consolidation had occurred since the initial repair was completed. This second inspection indicated that no additional repairs were needed and that restoration had been completed.

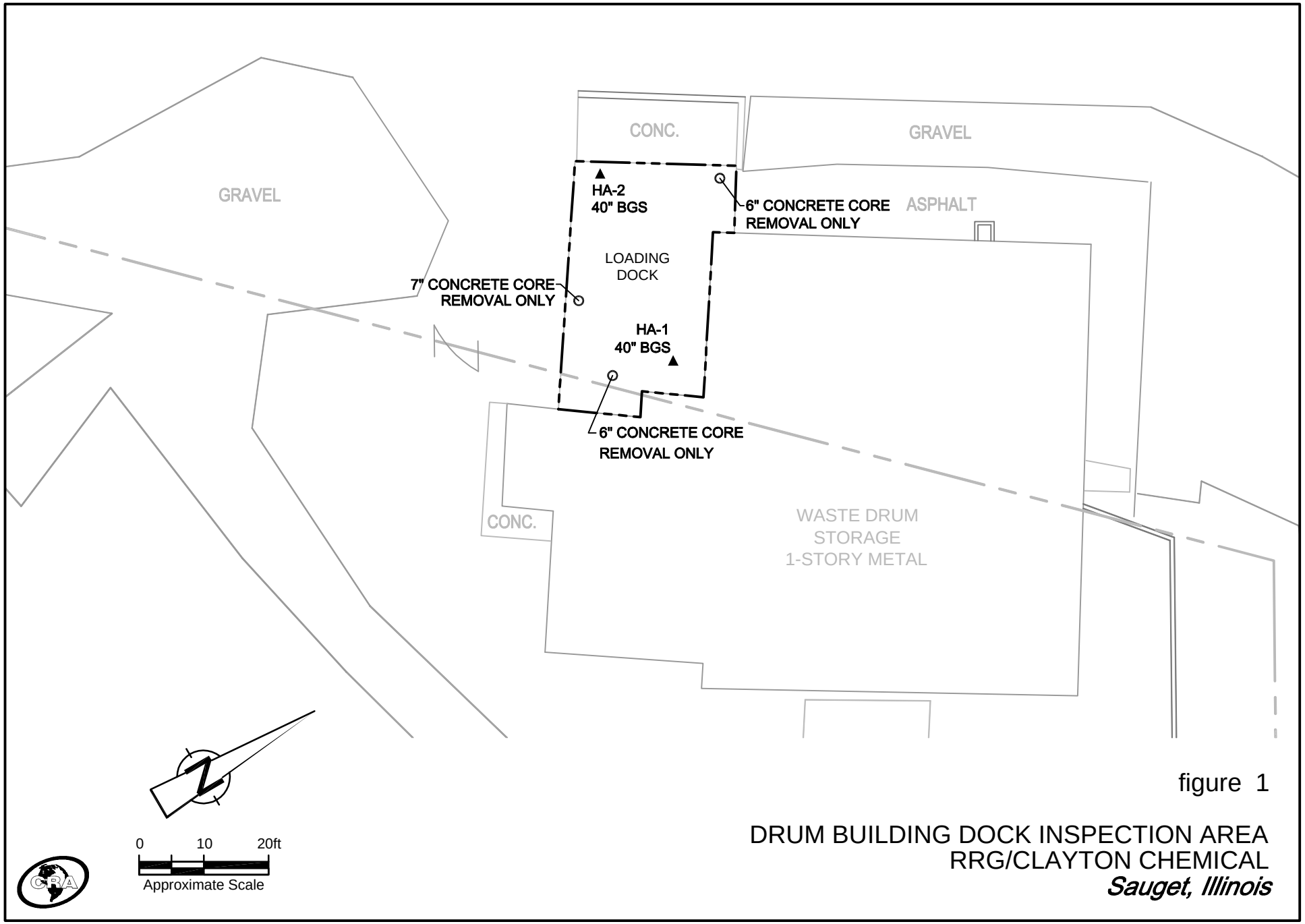


figure 1

DRUM BUILDING DOCK INSPECTION AREA
RRG/CLAYTON CHEMICAL
Sauget, Illinois

42192-03(MEMO096)GN-CO001 JUN 19/2007

Resource Recovery Group/Clayton Chemical Company
Drum Dock Inspection-June 5-6, 2007
Sauget, Illinois
CRA Project No. 042192

CONESTOGA-ROVERS & ASSOCIATES

Photo #1 View (facing southeast) of the concrete core drilling location in use at the drum dock.

Photo #2 View (facing east) of drum dock following core drilling activities (note – removed cores at four of the locations).

Photo #3 View of subsurface soils below concrete core in one of the five core drilling locations on the drum dock.

Photo #4 View of spoil material generated from hand auger location HA-2 advanced approximately 40 inches below ground surface (bgs).

Resource Recovery Group/Clayton Chemical Company
Drum Dock Inspection-June 5-6, 2007
Sauget, Illinois
CRA Project No. 042192

CONESTOGA-ROVERS & ASSOCIATES

Photo #5 View of spoil materials generated from the hand auger location HA-1 advanced approximately 40 inches bgs.

Photo #6 View of a concrete core drilling location following the completion of restoration activities (the placement of Quikrete precision grout).